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VIA ECF ONLY

Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Dalton, et al. v. Gem Financial Services, Inc. et al., 15-cv-05636 (BMC)

Dear Judge Cogan:

We represent Individual and Representative Plaintiffs David Dalton, Yovani Broadus, and Diori Johnson in the above-referenced matter, and we write regarding the December 31, 2015 deadline for the completion of fact discovery on Plaintiffs' individual claims, and the January 15, 2016 Status Conference before the Court.

The parties have exchanged their initial disclosures and have scheduled a party deposition for next week. However, effective on Tuesday, December 15, 2015, I will be leaving the Ottinger Firm. Mr. Graff will provide continuity in our representation of Plaintiffs, and we are confident that we will continue to effectively prosecute this case. However, to ensure an orderly transition, we respectfully request a two-week extension of the referenced discovery deadline and a corresponding two-week adjournment of the status conference. This is the first request for an extension, and Defendants do not object to the request.

Plaintiffs thank the Court for its attention to this matter.

Respectfully,

George D. Vallas

cc. Paul Solda, Esq. (by e-mail and ECF)